

From: [Will Graebe](#)
To: [Valerie Bateman](#)
Cc: [Heather Benjamin](#); [June Allison](#); [Kenzie Rakes](#); [Jeff Roether](#); [Shannon Joseph](#); [Suzanne Schrager](#)
Subject: RE: Calloway-Durham v. NC DOJ et al, 5:21-cv-000371-BO
Date: Sunday, March 17, 2024 5:41:19 PM
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[Defendant North Carolina Department of Justice Document Production Chart.pdf](#)



Valerie:

Please find below a ShareFile link to an additional production of documents. This production contains NCDOJ018. We meant to include these documents with the production that was served on Friday.

NCDOJ018 is produced in compliance with the Court's directive to produce responsive information and documents not already produced related to the hiring, promotion, and reclassification decisions reflected in NCDOJ002048-76, limited to the time period of January 1, 2017 to October 2020 and the Public Safety Section. This volume contains two files (a total of 46 pages) that are copies of hardcopy documents related to attorney hirings, promotions, and reclassifications within the Public Safety Section between January 1, 2017 and October 2020.

Please also find attached an updated version of the chart specifying the discovery requests to which the documents are responsive.

Please let us know if you have any trouble accessing the documents.

ShareFile link: <https://morningstarlawgroup.sharefile.com/d-se91181aa563245c3a034c377604e095a>



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Our Raleigh office is moving! Effective April 15, 2024, our new address will be 434 Fayetteville Street, Suite 2200, Raleigh, NC 27601.

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From: Will Graebe
Sent: Friday, March 15, 2024 7:06 PM
To: 'Valerie Bateman' <valerie@newsouthlawfirm.com>
Cc: 'Heather Benjamin' <Heather@newsouthlawfirm.com>; 'June Allison' <june@newsouthlawfirm.com>; Kenzie Rakes <krakes@morningstarlawgroup.com>; Jeff Roether <jroether@morningstarlawgroup.com>; Shannon Joseph <sjoseph@morningstarlawgroup.com>; Suzanne Schrager <sschrager@morningstarlawgroup.com>
Subject: RE: Calloway-Durham v. NC DOJ et al, 5:21-cv-000371-BO

Valerie:

Please find below a ShareFile link that contains the following items:

- NC DOJ's prior document productions reproduced in PDF format, as you requested.
- NC DOJ's production volumes 015-17, produced in PDF format and without any load or text files, as you requested. These volumes are produced in compliance with the Court's directive to produce responsive information and documents not already produced related to the hiring, promotion, and reclassification decisions reflected in NCDOJ002048-76, limited to the time period of January 1, 2017 to October 2020 and the Public Safety Section.

Please also find attached a chart specifying the discovery requests to which the documents are responsive.

Regarding the supplemental document production that is being made today (NCDOJ015-17), here is a description of each production volume:

- **NCDOJ015:** This volume is not responsive to a discovery request. This volume contains document retention schedules that are offered in exchange for the withdrawal of 30(b)(6) Topic 13.
- **NCDOJ016:** These documents are being produced in compliance with the Court's directive to produce responsive information and documents not already produced related to the hiring, promotion, and reclassification decisions reflected in NCDOJ002048-76, limited to the time period of January 1, 2017 to October 2020 and the Public Safety Section. This volume contains copies of hardcopy documents related to